



DEPARTMENT OF HEALTH & HUMAN SERVICES

PUBLIC HEALTH SERVICE
NATIONAL INSTITUTES OF HEALTH

FOR US POSTAL SERVICE DELIVERY:

Office of Laboratory Animal Welfare
6700B Rockledge Drive, Suite 2500, MSC 6910
Bethesda, Maryland 20892-6910
Home Page: <http://grants.nih.gov/grants/olaw/olaw.htm>

FOR EXPRESS MAIL:

Office of Laboratory Animal Welfare
6700B Rockledge Drive, Suite 2500
Bethesda, Maryland 20817
Telephone: (301) 496-7163
Facsimile: (301) 480-3387

February 23, 2022

Re: Animal Welfare Assurance
A3230-01 [OLAW Case 5V]

Ms. Pamela S. Caudill
Senior Associate Provost
for Research Administration
Yale University – New Haven
25 Science Park, (b) (4)
New Haven, CT 06520

Dear Ms. Caudill,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your February 7, 2022 letter reporting an instance of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at Yale University. According to the information provided, OLAW understands that two mice had been identified as requiring euthanasia and sick cards were placed on the cages with instructions to sacrifice within 24 hours. The investigator responsible removed the cards but did not euthanize the mice.

The corrective actions consisted of euthanizing the mice and counseling the investigator on the requirement for following veterinary orders, on not removing sick cards, and on promptly attending to humane concerns. The laboratory was informed that if staff cannot perform euthanasia as directed, that veterinary staff be authorized to do so. All investigators were reminded about promptly carrying out veterinary directives.

Based on its assessment of this explanation, OLAW understands that measures have been implemented to correct and prevent recurrence of this problem. While OLAW concurs with the actions taken by the institution to comply with the PHS Policy, we note that the *Guide for the Care and Use of Laboratory Animals* states the following: "In the case of a pressing health problem, if the responsible person (e.g., investigator) is not available or if the investigator and veterinary staff cannot reach consensus on treatment, the veterinarian must have the authority, delegated by senior administration and the IACUC, to treat the animal, remove it from the experiment, institute appropriate measures to relieve pain or distress, or perform euthanasia if necessary." As such, the veterinary staff should already be authorized to euthanize animals when necessary, and no additional permission needs to be granted by the laboratory staff. Thank you for informing OLAW about this matter.

Sincerely,

(b) (6)

Axel Wolff, M.S., D.V.M.
Deputy Director
Office of Laboratory Animal Welfare

cc: IACUC Chair

A3230-5V

Yale Office of Research Administration

PAMELA S. CAUDILL
Senior Associate Provost
for Research Administration

PO Box 208327
New Haven CT 06520-8327
T 203 785-3012
F 203 785-3510
pamela.caudill@yale.edu

courier
25 Science Park, Suite 322
New Haven CT 06511

February 7, 2022

Brent Morse, DVM, DACLAM
Office of Laboratory Animal Welfare
National Institutes of Health
6700B Rockledge Drive
Suite 2500, MSC 6910
Bethesda, MD 20892

Dear Dr. Morse:

In accordance with the Public Health Service Policy and Yale University's Animal Welfare Assurance (#D16-00146), I am writing to report the fact-finding results of an animal welfare-related incident identified by the Yale Animal Resource Center (YARC).

On October 14, 2021, YARC's Veterinary Clinical Services (VCS) identified two adult mice, deemed a humane concern for separate reasons. VCS placed the sick cards and instructed the responsible researcher to euthanize the mice no later than 24 hrs. The mice were found after the 24-hour deadline by routine monitoring and euthanized.

During the Office of Animal Research Support (OARS) fact-finding activity, the Principal Investigator clarified that the responsible researcher removed the sick cards and inadvertently forgot to euthanize the animals as recommended by the VCS. In response, the OARS Research Liaison emphasized the importance of following veterinary orders and addressing humane concerns within the allotted time period and if unable to do so, the laboratory should authorize VCS to perform the euthanasia on their behalf. The OARS Training Manager retrained the responsible lab personnel for identification of "sick" mice and reinforced not to remove sick cards. Additionally, on December 21, 2021, in an email to all members of the research community, OARS clarified the IACUC's expectations regarding deadlines for addressing veterinary orders.

The IACUC reviewed the details of the incident at its regularly scheduled monthly meeting on November 10, 2021 and accepted the remediation actions taken.

In accordance with university procedure, this incident will be reported to the appropriate NIH Institute/Center. If you have questions regarding this report, please contact [REDACTED] (b) (6)

Sincerely,

**Pamela
Caudill**

Digitally signed by Pamela
Caudill
Date: 2022.02.09 08:37:17
-05'00'

Pamela S. Caudill
Institutional Official
Senior Associate Provost for Research Administration

Cc:

[REDACTED] (b) (6)
Adam Wisnewski, IACUC Chair, Yale University
James Macy, Attending Veterinarian, Yale University
[REDACTED] (b) (6)

Wolff, Axel (NIH/OD) [E]

From: OLAW Division of Compliance Oversight (NIH/OD)
Sent: Friday, February 11, 2022 7:28 AM
To: (b) (6)
Cc: OLAW Division of Compliance Oversight (NIH/OD)
Subject: RE: A Final Report from Pamela Caudill of Yale University dated February 7, 2022 (Failure to carry out veterinary orders)

Thank you for this report. We will send a response soon.

Axel Wolff, M.S., D.V.M.
Deputy Director, OLAW

From: (b) (6)
Sent: Wednesday, February 9, 2022 1:45 PM
To: OLAW Division of Compliance Oversight (NIH/OD) <olawdco@od.nih.gov>
Cc: Macy, James <james.macy@yale.edu>; (b) (6) Caudill, Pamela <pamela.caudill@yale.edu>; accredit@AAALAC.org; (b) (6)
Subject: [EXTERNAL] A Final Report from Pamela Caudill of Yale University dated February 7, 2022 (Failure to carry out veterinary orders)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and are confident the content is safe.

Dear Dr. Morse,

I've attached a final report from Pamela Caudill of Yale dated February 7, 2022.

Regards,

(b) (6)